

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIA JOSE PIZARRO

Plaintiff/Counterclaim
Defendant

v.

EUROS EL TINA RESTAURANT LOUNGE
AND BILLIARDS CORP., SANTIAGO
QUEZADA, SANTIAGO QUEZADA JR.

Defendants/Counterclaim
Plaintiffs/Third-Party
Plaintiffs

v.

EMITON FERNANDEZ, NARCISO GOMEZ,
JOSE E. CASTRO, TOMAS ANDRES
PIZARRO ZEPEDA, ELADIO CASTRO
PRODUCTIONS INC., ZOILIMAR MEJIA,
Third-Party Defendants

1:20-cv-05783-AKH

NOTICE OF MOTION
Turnover, Leave to Register Judgment

PLEASE TAKE NOTICE on August 14, 2025, at 9:30 a.m. (“return date”), plaintiff-judgment creditor Maria Jose Pizarro will move this Court before the Honorable Alvin K. Hellerstein at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order:

- (a) Directing: (i) that defendant-judgment debtor Santiago Quezada turnover and deliver his watches and jewelry (listed in Schedule A/B Item 12) to the sheriff for sale in the manner prescribed by law, pursuant to CPLR 5225(a); (ii) that the first portion of the sale proceeds in an amount not exceeding \$1,000 be paid over to Mr. Quezada based on the exemption in CPLR 5205(a)(6); (iii) that Maria’s judgment against Mr. Quezada, less any amounts paid to date, be adjudged to be a lien upon the surplus; and (iv) that the surplus be applied to Maria’s judgment against Mr. Quezada, less any amounts paid to date;
- (b) Directing: (i) that Mr. Quezada turnover and deliver his 2024 Mercedes Benz GLS 600 Z4 (listed in Schedule A/B Item 3.1) to the sheriff for sale in the manner prescribed by

- law; (ii) that the first portion of the sale proceeds be applied to the lien of Mercedes Benz Financial Services; (iii) that the second portion of the sale proceeds in an amount not exceeding \$4,000 be paid over to Mr. Quezada based on the exemption in CPLR 5205(a)(8); and (iv) that Maria's judgment against Mr. Quezada, less any amounts paid to date, be adjudged to be a lien upon the surplus; and (v) that the surplus be applied to Maria's judgment against Mr. Quezada, less any amounts paid to date;
- (c) granting leave to register the judgment (ECF [#194](#)) with the United States District Court for the Northern District of Illinois, pursuant to 28 U.S.C. § 1963; and
- (d) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE in accordance with Local Civil Rule 6.1(b), opposition papers must be served by August 6, 2025, and if the motion is opposed reply papers will be served by August 13, 2025.

PLEASE TAKE FURTHER NOTICE that per Individual Rule 2.D, the return date is not an appearance date.

Dated: New York, NY
July 23, 2025

Amini LLC

/s/ Jeffrey Chubak
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